

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

PROGRESSIVE DIRECT INSURANCE
COMPANY, a foreign insurance company;

Plaintiff,

v.

DANIEL J. ANDREW and “JANE DOE”
ANDREW, individually and as a marital
community; LANCE PETKOVITS and
LAURIE J. MURRAY, as joint personal
representatives of the Estate of Katherine E.
Petkovits;

Defendants.

No. 2:22-cv-01466-RSM

**STIPULATION AND ORDER OF
VOLUNTARY DISMISSAL OF
DEFENDANTS LANCE PETKOVITZ
AND LAURIE J. MURRAY**

Progressive Direct Insurance Company (hereinafter “Progressive”) and Defendants Lance
Petkovits and Laurie J. Murray hereby agree and stipulate as follows:

1. Mr. Petkovits and Ms. Murraray agree to be bound by any coverage decision made
by the Court and/or jury in this action, or a higher court if an appeal is made. Mr. Petkovitz
and Ms. Murray acknowledges and agrees that they have been provided with the
opportunity to consult with counsel and that her representatives have signed this Stipulation
free from any duress or undue influence on the part of Progressive.

2. In consideration of this agreement, Progressive agrees to dismiss Lance Petkovits and Laurie J. Murray as a party defendant from its Complaint, without prejudice, and without fees or costs to either party.

DATED this 9th day of March, 2023.

LEATHER LAW GROUP

s/ Thomas Lether

Ryan Bisel, WSBA #58634
Thomas Lether, WSBA #18089
1848 Westlake Ave N., Suite 100
Seattle, WA 98109
P: 206-467-5444 F: 206-467-5544
rbisel@letherlaw.com
tlether@letherlaw.com
Attorneys for Plaintiff

MORGAN & KOONTZ PLLC

/s/ Mark E. Koontz

Mark E. Koontz, WSBA #26212
2501 N Alder St
Tacoma, WA 98406
Phone: (253) 761-4444
mark@morgankoontz.com
*Counsel for Defendants Lance
Petkovits and Laurie J. Murray*

II. ORDER

Based on the foregoing stipulation, it is hereby Ordered as follows:

1. Defendants Lance Petkovits and Laurie J. Murray will be bound by any decision or ruling regarding coverage for claims arising from Progressive's litigation against Progressive's policyholder Daniel Andrew under Progressive Policy 918705648 made by the Court and/or jury in this action, or higher court if an appeal is made.

2. Defendants Lance Petkovitz and Laurie J. Murray are hereby DISMISSED as a party defendant from Plaintiff's Complaint, without prejudice, and without fees or costs to either party.

DATED this 9th day of March, 2023.



RICARDO S. MARTINEZ
UNITED STATES DISTRICT JUDGE

Presented By:

LEATHER LAW GROUP

s/ Thomas Lether
Ryan Bisel, WSBA #58634
Thomas Lether, WSBA #18089
1848 Westlake Ave N., Suite 100
Seattle, WA 98109
P: 206-467-5444 F: 206-467-5544

rbisel@letherlaw.com
tlether@letherlaw.com

Attorneys for Plaintiff

STIPULATION AND ORDER OF VOLUNTARY
DISMISSAL OF DEFENDANTS LANCE PETKOVITS AND
LAURIE J. MURRAY – 3

LEATHER LAW GROUP
1848 WESTLAKE AVENUE N. STE. 100
SEATTLE, WASHINGTON 98109
P: (206) 467-5444 F: (206) 467-5544

CERTIFICATE OF SERVICE

The undersigned hereby certifies under the penalty of perjury under the laws of the State of Washington that on this date I caused to be served in the manner noted below a true and correct copy of the foregoing on the following party(ies):

Mark E. Koontz
Morgan & Koontz PLLC
2501 N Alder St
Tacoma, WA 98406
Phone: (253) 761-4444
mark@morgankoontz.com
*Counsel for Defendants Lance
Petkovits and Laurie J. Murray*

By: ☐ **First Class Mail** ☒ **E-Service/Email** ☐ **Legal Messenger**

DATED this 9th day of March, 2023 at Seattle, Washington.

/s/ Nico Schulz
Nico Schulz | Paralegal